Michael P. Harris THE HONORABLE PAUL SNYDER 1 Attorney at Law Chapter 11 2 2125 Fifth Avenue Hearing Date: October 29, 2014 Seattle, WA 98121 Hearing Time: 9:30 a.m. (206) 622-7434 Hearing Place: 1717 Pacific Ave., #2100, Rm H, Tacoma Responses Due: October 28, 2014 at Noon 4 5 6 7 UNITED STATES BANKRUPTCY COURT 8 WESTERN DISTRICT OF WASHINGTON 9 10 In Re: No. 14-45615 11 Holley Moulding, Inc., NOTICE OF HEARING AND 12 MOTION TO SHORTEN TIME Debtor(s). 13 NOTICE OF HEARING 14 Please take notice that the debtor's motion to shorten time for hearing of its motion to 15 16 Compel Turnover of Estate Property shall be heard on October 29, 2014, at 9:30 a.m. before the 17 Honorable PAUL SNYDER at 1717 Pacific Ave., #2100, Rm H, Tacoma, Washington. Any 18 party objecting to the requested relief shall file their objection no later than October 28, 2014 at 19 Noon and shall appear at the hearing and state their objection. In absence of a timely objection, 20 the undersigned may present an Order granting the requested relief prior to the date of the 21 hearing. 22 23 24 25

Case 14-45615-PBS Doc 9 Filed 10/23/14 Ent. 10/23/14 13:52:14 Pg. 1 of 3

NOTICE OF HEARING AND MOTION TO SHORTEN

TIME - 1

Michael P. Harris, Attorney at Law

2125 Fifth Avenue Seattle, WA 98121

(206)622-7434

## MOTION TO SHORTEN TIME FOR HEARING OF TURNOVER MOTION

COMES NOW the debtors in possession, Holley Moulding, Inc., and New Zealand Forest Products USA, LLC, by their attorney Michael Harris, and hereby move for an Order shorting time for notice of their motion to compel turnover. In support of this motion, the debtors state as follows:

- 1. These debtors filed for relief under Chapter 11 of the Bankruptcy Code on October 20, 2014. A receiver, F. John Stark, III, was in possession of property of both estates. After request, he has not turned over the property.
- 2. The debtors are suffering considerable financial damage by the delay caused by the Receiver. Shortening time of their motion to turn over estate property is proper under these circumstances.
- 3. The debtors request that their motions be heard on October 29, 2014 at 9:30 am, with notice to be given on October 23, 2014 by electronic mail to the Receiver and his state court attorney, with notice followed up by U.S. mail sent that same day.
- 4. The Receiver does not consent to shortening time and states he is retaining local counsel. The US Trustee and Concepts Financial, the factoring company, have consented to shortened time.

NOTICE OF HEARING AND MOTION TO SHORTEN TIME - 2

Michael P. Harris, Attorney at Law 2125 Fifth Avenue Seattle, WA 98121 (206)622-7434

| 1  | WHEREFORE the debtors pray for an Order shortening time for notice of their motion |
|----|--|
| 2  | for Turnover of Estate Property as described above. A proposed order is attached.  |
| 3  | Dated October 23, 2014.  |
| 4  |  |
| 5  | /s/Michael P. Harris<br>Michael P. Harris,   |
| 6  | Attorney at Law<br>WSBA#13506  |
| 7  | W 551 11 133 00  |
| 8  |  |
| 9  |  |
| 10 |  |
| 11 |  |
| 12 |  |
| 13 |  |
| 14 |  |
| 15 |  |
| 16 |  |
| 17 |  |
| 18 |  |
| 19 |  |
| 20 |  |
| 21 |  |
| 22 |  |
| 23 |  |
| 24 |  |
| 25 |  |

NOTICE OF HEARING AND MOTION TO SHORTEN TIME -  $3\,$ 

Michael P. Harris, Attorney at Law 2125 Fifth Avenue Seattle, WA 98121 (206)622-7434